

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

Christopher Cathey,)	Civil Action No. 3:13-343-CMC
)	
Plaintiff,)	
)	
vs.)	
)	
Account Control Technology, Inc.; and)	ANSWERS OF DEFENDANT ACCOUNT
DOES 1-10, inclusive,)	CONTROL TECHNOLOGY, INC.
)	TO LOCAL RULE 26.01
)	INTERROGATORIES
Defendants.		

Defendant Account Control Technology, Inc. (hereinafter referred to as “ACT”), by and through its undersigned counsel, hereby submits its Answers to the Local Civil Rule 26.01 Interrogatories:

(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

RESPONSE: ACT is not aware of any such subrogation interests at this time.

(B) As to each claim, state whether it should be tried jury or non-jury and why.

RESPONSE: Plaintiff has requested a jury trial on each of his claims.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns a 10% or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns 10% or more of the outstanding shares.

RESPONSE: ACT is a private, family owned company.

(D) State the basis for asserting the claim in the division it was filed (or the basis of any challenge to the appropriateness of the division).

RESPONSE: ACT does not challenge the division in which this case was filed.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; (3) a statement of the status of the related action.

RESPONSE: ACT is unaware of any related matters filed in this District.

(F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE: ACT is properly identified in the Complaint.

(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

RESPONSE: At this time, ACT does not contend that some other person or legal entity is liable in whole or in part to it or Plaintiff

Respectfully submitted,

s/Krista M. McGuire

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ATTORNEY FOR DEFENDANT

ACCOUNT CONTROL TECHNOLOGY, INC.

April 2, 2013
Charleston, South Carolina